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7 IN THE UNITED STATES DISTRICT COURT
8 FOR THE TERRITORY OF GUAM

9 UNITED STATES OF AMERICA,
10
11 Plaintiff,
12 vs.
13 RICKY JAMES JR. SALAS SANTOS,
14 Defendant.

CRIMINAL CASE NO. 20-00021

**UNITED STATES MOTION TO
RELEASE GRAND JURY
TRANSCRIPTS**

15 COMES NOW the United States and moves this Honorable Court for an order allowing the
16 release to defense counsel of the testimony of the witnesses who appeared before the Grand Jury in
17 this matter and who will testify at trial. Presently, these transcripts are sealed pursuant to Federal
18 Rules of Criminal Procedure 6(e); counsel is entitled to receive them after the witnesses' testimony
19 pursuant to 18 U.S.C. § 3500.

20 This motion is made for the reason that release of this document prior to the testimony of the
21 witnesses will expedite the timely conduct of the trial itself.

22 Respectfully submitted this 4th day of March, 2021.

23
24 SHAWN N. ANDERSON
United States Attorney
25 Districts of Guam and NMI

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27 By: /s/ Rosetta L. San Nicolas
ROSETTA L. SAN NICOLAS
28 Assistant U.S. Attorney